

**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JENNIFER MAITRE, as Mother, Guardian and Next Friend of CHRISTIAN FRANCIS MAITRE, a Minor,]
Plaintiff,]
v.]
ELI LILLY AND COMPANY,]
Defendant.]

Civil Action No.: 1:05-cv-10442-JLT
Next Event: Status Conference on
June 22, 2006 at 10:00 a.m.

**CONSENT MOTION TO EXTEND TIME TO FILE PLAINTIFF'S OPPOSITION TO
DEFENDANT ELI LILLY AND COMPANY'S MOTION FOR SUMMARY JUDGMENT**

COMES NOW the Plaintiff Jennifer Maitre, as mother, guardian and next friend of Christian Francis Maitre, a minor (collectively "Plaintiff"), by and through counsel, with the consent of Defendant Eli Lilly and Company ("Lilly"), and moves the Court to extend the time in which Plaintiff shall file her Opposition to Defendant's Motion for Summary Judgment until July 28, 2006, and as grounds therefore states:

1. Defendant filed its Motion for Summary Judgment on June 15, 2006, and Plaintiff's Opposition to same would be due on June 29, 2006.
2. Defendant's Motion involves complex issues regarding preconception generational tort law, and requires a more extensive review and preparation in order for the Plaintiff to properly respond.
3. Counsel for Defendant Lilly has consented to the granting of this Motion.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order extending the time in which Plaintiff shall file her Opposition to Defendant's Motion for Summary Judgment to July 28, 2006.

Respectfully submitted,

/s/ Erica Tennyson
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Dated: June 19, 2006

Counsel for Plaintiff

LOCAL RULE 7.1(A)(2) CONFERRAL CERTIFICATION

I have been informed that consent to the foregoing Motion to Extend Time to File Plaintiff's Opposition to Defendant Eli Lilly and Company's Motion for Summary Judgment was granted by counsel for Defendant Lilly on June 16, 2006.

/s/ Erica Tennyson
Erica Tennyson

CERTIFICATE OF SERVICE

I, Erica Tennyson, hereby certify that this Consent Motion to Extend Time to File Plaintiff's Opposition to Defendant's Motion for Summary Judgment, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 16, 2006.

/s/ Erica Tennyson

Erica Tennyson

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[PROPOSED] ORDER

UPON CONSIDERATION of the Consent Motion to Extend Time to File Plaintiff's Opposition to Defendant Eli Lilly and Company's Motion for Summary Judgment, and for good cause shown, it is this _____ day of _____, 2006,

ORDERED that the Motion be and hereby is GRANTED;

AND IT IS FURTHER ORDERED that Plaintiff shall file her Opposition to Defendant Eli Lilly and Company's Motion for Summary Judgment on or before July 28, 2006.

JOSEPH L. TAURO
United States District Judge